

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

PRO SLAB, INC. and BREMER)
CONSTRUCTION MANAGEMENT, INC.,)
on behalf of themselves and all others)
similarly situated,)

Plaintiff,)

v.)

ARGOS USA CORP., ARGOS NORTH)
AMERICA CORP., ARGOS USA LLC, et. al.,)

Defendants.)

Case No. 2:17-cv-03185-DCN

**DEFENDANTS EVANS CONCRETE HOLDINGS, INC. AND EVANS CONCRETE,
LLC'S MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION AND FOR
IMPROPER VENUE**

PLEASE TAKE NOTICE that Evans Concrete Holdings, Inc. and Evans Concrete, LLC, will move before the presiding Judge, for the United States District Court, at such place and time as the Court may appoint, to dismiss this action for lack of personal jurisdiction pursuant to Federal Rule of Civil Procedure 12(b)(2) and to dismiss this action for improper venue pursuant to Federal Rule of Civil Procedure 12(b)(3). The grounds for this Motion are set forth in the accompanying Memorandum in Support and Affidavit of Timothy T. ("Bo") Strickland.

DATED: February 14, 2018

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/s/ F. Cordes Ford IV

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